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FILED IN THE U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

FEB 04 2019

SEAN F. McAVOY, CLERK
DEPUTY
RICHLAND, WASHINGTON

7 UNITED STATES DISTRICT COURT
8 FOR THE EASTERN DISTRICT OF WASHINGTON

9
10 UNITED STATES OF AMERICA,)

11 Plaintiff,)

12 vs.)

13 MARCIAL BRAVO-ZAMBRANO,)

14 Defendant.)
15)
16)

4:15-CR-6049-EFS-20

Plea Agreement

17 Plaintiff, United States of America, by and through Joseph H. Harrington,
18 United States Attorney for the Eastern District of Washington, and Stephanie Van
19 Marter, Assistant United States Attorney for the Eastern District of Washington,
20 and Defendant MARCIAL BRAVO-ZAMBRANO, and the Defendant's counsel,
21 Zachary Ayers, agree to the following Plea Agreement:

22 1. Guilty Plea and Maximum Statutory Penalties:

23 The Defendant, MARCIAL BRAVO-ZAMBRANO, agrees to enter a plea
24 of guilty to Count 1 of the Second Superseding Indictment filed on December 6,
25 2016, charging the Defendant with Conspiracy to Distribute 500 Grams or More
26 of a Mixture or Substance Containing a Detectable Amount of
27 Methamphetamine, 5 Kilograms or More of Cocaine, 1 Kilogram or More of

28 Plea Agreement - 1

1 Heroin and 400 grams or More of N-phenyl-N Propanamide (hereafter Fentanyl),
2 in violation of 21 U.S.C. § 841(a)(1), (b)(1)(A)(i), (ii)(I), (vi), and (viii); all in
3 violation of 21 U.S.C. § 846.

4 The Defendant, MARCIAL BRAVO-ZAMBRANO, understands that the
5 charge contained in the Second Superseding Indictment is a Class A felony
6 charge. The Defendant, MARCIAL BRAVO-ZAMBRANO, also understands
7 that the maximum statutory penalty for Count 1, is not less than 10 years
8 imprisonment, which is non-suspendable and non-parolable, and a maximum
9 possible penalty of life imprisonment; a fine not to exceed \$10,000,000; a term of
10 supervised release of not less than 5 years up to a life term; denial of certain
11 federal benefits; **Deportation** and a \$100 special penalty assessment.

12 The Defendant, MARCIAL BRAVO-ZAMBRANO, understands that a
13 violation of a condition of supervised release carries an additional penalty of re-
14 imprisonment for all or part of the term of supervised release without credit for
15 time previously served on post-release supervision.

16 2. Denial of Federal Benefits:

17 The Defendant understands that by entering this plea of guilty the
18 Defendant is no longer eligible for assistance under any state program funded
19 under part A of title IV of the Social Security Act (concerning Temporary
20 Assistance for Needy Families) or benefits under the food stamp program or any
21 state program carried out under the Food Stamp Act. 21 U.S.C. § 862a. Further,
22 the Court may deny the Defendant's eligibility to any grant, contract, loan,
23 professional license, or commercial license provided by an agency of the United
24 States or by appropriated funds of the United States. 21 U.S.C. § 862.

25 3. The Court is Not a Party to the Agreement:

26 The Court is not a party to this Plea Agreement and may accept or reject
27 this Plea Agreement. Sentencing is a matter that is solely within the discretion of

1 the Court. The Defendant understands that the Court is under no obligation to
2 accept any recommendations made by the United States and/or by the Defendant;
3 that the Court will obtain an independent report and sentencing recommendation
4 from the U.S. Probation Office; and that the Court may, in its discretion, impose
5 any sentence it deems appropriate up to the statutory maximums stated in this
6 Plea Agreement.

7 The Defendant acknowledges that no promises of any type have been made
8 to the Defendant with respect to the sentence the Court will impose in this matter.
9 The Defendant understands that the Court is required to consider the applicable
10 sentencing guideline range, but may depart upward or downward under the
11 appropriate circumstances.

12 The Defendant also understands that should the sentencing judge decide
13 not to accept any of the parties' recommendations, that decision is not a basis for
14 withdrawing from this Plea Agreement or a basis for withdrawing his plea of
15 guilty.

16 4. Effect on Immigration Status:

17 The Defendant recognizes that pleading guilty may have consequences
18 with respect to his immigration status if he is not a citizen of the United States.
19 Under federal law, a broad range of crimes are removable offenses, including the
20 offense to which the Defendant is pleading guilty. Indeed, because the Defendant
21 is pleading guilty to Conspiracy to Distribute various controlled substances, in
22 violation of 21 U.S.C. § 841(a)(1), (b)(1)(A)(i), (ii)(I), (vi), and (viii); all in
23 violation of 21 U.S.C. § 846, removal is presumptively mandatory. Removal and
24 other immigration consequences are the subject of a separate proceeding,
25 however, and the Defendant understands that while deportation and/or removal
26 appears to be a virtual certainty, no one, including his attorney or the district
27 court, can predict with absolute certainty the effect of his conviction on his
28

1 immigration status. The Defendant nevertheless affirms that he wants to plead
2 guilty regardless of any immigration consequences that his plea may entail, even
3 if automatic removal from the United States is a virtual certainty.

4 5. Waiver of Constitutional Rights:

5 The Defendant, MARCIAL BRAVO-ZAMBRANO, understands that by
6 entering this plea of guilty the Defendant is knowingly and voluntarily waiving
7 certain constitutional rights, including:

- 8 (a). The right to a jury trial;
- 9 (b). The right to see, hear and question the witnesses;
- 10 (c). The right to remain silent at trial;
- 11 (d). The right to testify at trial; and
- 12 (e). The right to compel witnesses to testify.

13 While the Defendant is waiving certain constitutional rights, the Defendant
14 understands the Defendant retains the right to be assisted through the sentencing
15 and any direct appeal of the conviction and sentence by an attorney, who will be
16 appointed at no cost if the Defendant cannot afford to hire an attorney. The
17 Defendant also acknowledges that any pretrial motions currently pending before
18 the Court are waived.

19 6. Elements of the Offense:

20 The United States and the Defendant agree that in order to convict the
21 Defendant of Conspiracy to Distribute 500 Grams or More of a Mixture or
22 Substance Containing a Detectable Amount of Methamphetamine, 5 Kilograms
23 or More of Cocaine, 1 Kilogram or More of Heroin and 400 grams or More of
24 Fentanyl, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(A)(i), (ii)(I), (vi), and
25 (viii); all in violation of 21 U.S.C. § 846, the United States would have to prove
26 beyond a reasonable doubt the following elements:

1 *First*, beginning on a date unknown but by on or about January 2010
2 continuing until on or about December 6, 2016, the Defendant,
3 MARCIAL BRAVO-ZAMBRANO, in the Eastern District of
4 Washington, entered into an agreement with one or more persons to
5 commit the crime of distribution of methamphetamine and/or
6 Cocaine and/or Heroin and/or Fentanyl as charged in the Second
7 Superseding Indictment;

8 *Second*, the Defendant became a member of the conspiracy knowing
9 of at least one of its objects and intending to help accomplish it and;

10 *Third*, the agreement to distribute involved more than 500 grams of
11 a mixture or substance containing a detectable amount of
12 methamphetamine, 5 Kilograms or More of Cocaine, 1 Kilogram or
13 More of Heroin and 400 grams or More of Fentanyl and would be
14 reasonably foreseeable to a member of the conspiracy.

15 7. Factual Basis and Statement of Facts:

16 The United States and the Defendant stipulate and agree that the following
17 facts are accurate; that the United States could prove these facts beyond a
18 reasonable doubt at trial; and these facts constitute an adequate factual basis
19 MARCIAL BRAVO-ZAMBRANO's guilty plea. This statement of facts does
20 not preclude either party from presenting and arguing, for sentencing purposes,
21 additional facts which are relevant to the guideline computation or sentencing,
22 unless otherwise prohibited in this agreement.

23 Members of the FBI Eastern Washington Safe Streets Violent Gang Task
24 Force- Tri-Cities (EWVGSSTF) have been investigating a transnational drug
25 trafficking organization operating here in the Eastern District of Washington and
26 elsewhere since at least 2011. During that investigation, Jese David Carillo
27

1 Casillas (hereafter Jese/Casillas) was identified as a high-ranking member of this
2 organization, first identified in the spring of 2015.

3 During this same time-frame, members of the Boston DEA were
4 conducting a parallel investigation into the money laundering activities of the
5 Ivan Hernandez Calvillo DTO. The DTO was moving bulk cash out of Canada
6 that it had gained through the sale of cocaine, heroin, and methamphetamine. The
7 DEA successfully placed an undercover operator (DEA UC) into the money-
8 laundering network. The basic need the DEA UC filled for the organization was
9 his ability to accept Canadian cash, deposit it, wash it electronically through his
10 business, and then wire US currency out in smaller deposits in Mexico and the
11 United States. The DEA UC would then charge a commission or percentage for
12 the washed cash, keep that percentage and report to Ivan and later Jese Casillas as
13 to the remaining amount available for wire transfer. This relationship ultimately
14 cultivated into Ivan and the organization seeking the DEA UC's assistance in
15 developing a new drug distribution group in Vancouver, British Columbia, with
16 ties to China.

17 In October 2014, an undercover money laundering operation was initiated
18 by Royal Canadian Mounted Police Federal Serious Organized Crime Unit
19 (RCMP FSOC) members to collect bulk money in the area of Vancouver, British
20 Columbia, from the DTO and to deliver it to the DEA investigators. Between
21 October 2014 and July 2016, Ivan, and later Casillas, were in direct
22 communication with the DEA UC via recorded What's App messenger and
23 arranged for approximately 15 cash money drops to be laundered by the DEA
24 UC. The way the code worked was that Ivan or Casillas provided the DEA UC a
25 serial number of a piece of currency. The DEA UC would communicate that
26 serial number so that when the two associates would meet, they would compare
27 serial numbers. Once that was confirmed, the money was handed off. The

1 amount laundered during these money drops totaled over \$1.6 million Canadian
2 Dollars.

3 On August 23, 2015, Calvillo arranged for a cash drop in Vancouver,
4 British Columbia, as well as the delivery of one kilogram of heroin. This time
5 Javier Camillo Gomez Calvillo, a.k.a. Angel was sent to make the money drop.
6 The meet was audio/video recorded. Angel was driving a blue Mercedes
7 registered to a residence associated with Sobieda Reynosa (previously identified
8 by the RCMP as a girlfriend/associate of an identified leader/organizer in the
9 Vancouver area). Angel delivered \$74,029 in Canadian currency to the Canadian
10 Under Cover (CUC) and a kilogram of heroin to the CUC. After the DEA UC
11 withdrew the percentage charged for laundering the money, Calvillo directed the
12 DEA UC to wire the remaining funds to accounts in Mexico.

13 Based upon the identification of the blue Mercedes and Gomez Calvillo,
14 the RCMP followed the activities of Gomez Calvillo. This surveillance led them
15 to the Grand Forks, British Columbia, area, an identified location associated with
16 this organization and backpacking narcotics across the border. The RCMP
17 followed the Mercedes to the Ramada Inn and identified that Reynosa registered
18 for a room at the hotel. On August 26, 2015, the RCMP was conducting
19 surveillance at the hotel and observed the aforementioned Mercedes leave the
20 hotel at approximately 5:00am occupied by Reynosa and Gomez Calvillo.
21 Surveillance confirmed its travel toward the border but then lost sight of the
22 vehicle for approximately 15-20 minutes. When the vehicle was located again, it
23 was coming back toward the hotel, this time with 5 occupants. The Mercedes
24 returned to the hotel where the five occupants were seen entering into room 203.
25 A short time later, the vehicle departed the hotel again, this time with four
26 occupants. A traffic stop was initiated and all occupants were arrested. The
27 driver was identified as Sobieda Reynosa the passengers were identified as the

1 Defendant MARCIAL BRAVO-ZAMBRANO, Co-Defendants Juan Zambrano
2 and Javier Camilo Gomez Calvillo.

3 A search warrant was obtained and on August 27, 2015, the search warrant
4 was executed on the vehicle. Inside a secret compartment in the vehicle, RCMP
5 located approximately 18 kilograms of methamphetamine, 4 kilograms of
6 cocaine, 171 grams of heroin, \$50,000 in UC currency, two loaded firearms,
7 ammunition, several backpacks, walkie talkies, jackets and one cellular phone. A
8 search warrant was also obtained for two rooms identified as utilized by these
9 individuals at the Ramada Inn. Located inside the room was Co-Defendant,
10 Miguel Reyes Garcia confirmed to be the fifth person seen earlier in the car. It
11 was further confirmed that the general location where the Mercedes traveled to at
12 5:00 a.m., returning with three additional passengers, correlates directly with a
13 trail head location utilized by the Calvillo DTO. Inside the motel room agents
14 seized the Defendant's wallet, a receipt and multiple cellular telephones.

15 The controlled substances were tested in Canada as well as by the DEA
16 laboratory and returned with the following results: (1) 16,606 grams of actual
17 methamphetamine; (2) 2005 kilograms of cocaine¹ and (3) 99.3 grams of heroin.
18 Subsequent fingerprint testing of the packages of controlled substances revealed a
19 number of fingerprints to include several belonging to Co-Defendant Miguel
20 Reyes Garcia.

21 Much like what occurred in Grand Forks, the United States would further
22 present testimony from two witnesses that the Defendant was identified as a
23 backpacker working for the organization taking loads of narcotics into Canada
24 and cash drug proceeds back to the United States. The United States would
25 further present testimony that the Defendant worked with his brother Co-

26
27 ¹ The DEA laboratory did not re-test the entire 4 kilograms of cocaine; only 2 of
28 the 4 kilograms seized.

1 Defendant Juan Zambrano previously, specifically transporting narcotics for
2 them within the organization.

3 8. The United States Agrees Not to File Additional Charges:

4 The United States Attorney's Office for the Eastern District of Washington
5 agrees not to bring any additional charges against the Defendant based upon
6 information in its possession at the time of this Plea Agreement and arising out of
7 Defendant's conduct involving illegal activity charged in this Second
8 Superseding Indictment, unless the Defendant breaches this Plea Agreement any
9 time before or after sentencing.

10 9. United States Sentencing Guideline Calculations:

11 The Defendant understands and acknowledges that the United States
12 Sentencing Guidelines (hereinafter "U.S.S.G.") are applicable to this case and that
13 the Court will determine the Defendant's applicable sentencing guideline range at
14 the time of sentencing.

15 (a). Base Offense Level and Application of U.S.S.G. §2D1.1

16 Commentary Note 8(D):

17 The Government and Defendant agree and stipulate that based upon the
18 overall quantities of the various drugs involved, his base offense level is 38². See
19 U.S.S.G. §2D1.1(c)(1) and Commentary 8(b). The parties further agree and
20 stipulate that if the Court were to convert the varying amounts and types of
21 controlled substances as directed by the Guidelines pursuant to this section, the
22 resulting offense level would remain the same³.

23
24
25 ² The United States does not have evidence this Defendant ever transported or
26 distributed Fentanyl during his involvement in the organization.

27 ³ Converting the amounts seized results in over 135,000 kilograms of marijuana,
28 which equates to an offense level 38.

1 (b). Role in the Offense and Adjusted Base Offense Level:

2 The United States and the Defendant agree that the Defendant was
3 “substantially less culpable than the average participant” in the conspiracy and
4 was a minimal participant in the criminal activity alleged in the Second
5 Superseding Indictment, resulting in a four-level decrease pursuant to U.S.S.G.
6 §3B1.2(a), Application Note 3(A). The United States and the Defendant further
7 agree that because the Defendant is a minimal participant and the otherwise
8 applicable base offense level is 38 pursuant to the Drug Quantity Table, an
9 additional four-level decrease applies pursuant to U.S.S.G. §2D1.1(a)(5). The
10 United States and the Defendant also agree that the offense involved all of the
11 factors set forth in U.S.S.G. §2D1.1(b)(17) (Guidelines Manual 2018) and, as a
12 minimal participant, the Defendant qualifies for an additional two-level decrease.
13 The United States and the Defendant agree that the foregoing adjustments result
14 in a cumulative reduction of ten levels.

15 (c). Specific Offense Characteristics- Dangerous Weapon:

16 Although there were firearms located inside the backpacks, the United
17 States has evidence that one firearm belonged to Co-Defendant Miguel Reyes
18 Garcia and the other to Co-Defendant Juan Zambrano. The parties therefore
19 agree and stipulate that two levels should not be applied to this Defendant
20 pursuant to U.S.S.G. §2D1.1(b)(1).

21 (d). Acceptance of Responsibility:

22 If the Defendant pleads guilty and demonstrates a recognition and an
23 affirmative acceptance of personal responsibility for the criminal conduct;
24 provides complete and accurate information during the sentencing process; does
25 not commit any obstructive conduct; accepts this Plea Agreement; and enters a
26 plea of guilty no later than the next Pre-Trial Conference, the United States will
27 move for a three (3) level downward adjustment in the offense level for the
28

1 Defendant's timely acceptance of responsibility, pursuant to U.S.S.G. §3E1.1(a)
2 and (b).

3 The Defendant and the United States agree that the United States may at its
4 option and upon written notice to the Defendant, not recommend a three (3) level
5 downward reduction for acceptance of responsibility if, prior to the imposition of
6 sentence, the Defendant is charged or convicted of any criminal offense
7 whatsoever or if the Defendant tests positive for any controlled substance.

8 Furthermore, the Defendant agrees to pay the \$100 mandatory special
9 penalty assessment to the Clerk of Court for the Eastern District of Washington,
10 at or before sentencing, and shall provide a receipt from the Clerk to the United
11 States before sentencing as proof of this payment, as a condition to this
12 recommendation by the United States.

13 (e). Criminal History:

14 The United States and the Defendant understand that the Defendant's
15 criminal history computation is tentative and that ultimately the Defendant's
16 criminal history category will be determined by the Court after review of the
17 Presentence Investigative Report. The United States and the Defendant have
18 made no agreement and make no representations as to the criminal history
19 category, which shall be determined after the Presentence Investigative Report is
20 completed.

21 10. Safety Valve:

22 The United States and the Defendant agree that the Defendant may be
23 eligible for the safety valve provisions of 18 U.S.C. § 3553(f) and U.S.S.G.
24 §5C1.2. At the time of this change of plea, the parties acknowledge that the
25 Defendant has not satisfied the fifth requirement of the safety valve. If the Court
26 finds that the Defendant meets the criteria set forth at 18 U.S.C. § 3553(f)(1)-(5),
27
28

1 the Court shall impose a sentence in accordance with the applicable sentencing
2 guidelines without regard to any statutory minimum sentence.

3 11. Length of Incarceration:

4 The parties are free to argue any lawful sentence. The Defendant
5 understands however, that unless he qualifies for application of the safety valve,
6 he cannot be sentenced to less than the mandatory minimum of ten years.

7 12. Criminal Fine:

8 The United States and the Defendant are free to make whatever
9 recommendation concerning the imposition of a criminal fine that they believe is
10 appropriate.

11 13. Supervised Release:

12 Should the Defendant be allowed to return to the United States lawfully,
13 the parties agree to recommend that the Court impose a 5-year term of supervised
14 release, to include the following special conditions, in addition to the standard
15 conditions of supervised release:

16 (1) that the Defendant's person, residence, office, vehicle, and
17 belongings are subject to search at the direction of the Probation Office;
18 and

19 (2) that the Defendant have no contact with any witnesses or Co-
20 defendants in this cause number.

21 14. Mandatory Special Penalty Assessment:

22 The Defendant agrees to pay the \$100 mandatory special penalty
23 assessment to the Clerk of Court for the Eastern District of Washington, at or
24 before sentencing, pursuant to 18 U.S.C. § 3013 and shall provide a receipt from
25 the Clerk to the United States before sentencing as proof of this payment.

1 15. Payments While Incarcerated:

2 If the Defendant lacks the financial resources to pay the monetary
3 obligations imposed by the Court, the Defendant agrees to earn the money to pay
4 toward these obligations by participating in the Bureau of Prisons' Inmate
5 Financial Responsibility Program.

6 16. Additional Violations of Law Can Void Plea Agreement:

7 The Defendant and the United States agree that the United States may at its
8 option and upon written notice to the Defendant, withdraw from this Plea
9 Agreement or modify its recommendation for sentence if, prior to the imposition
10 of sentence, the Defendant is charged or convicted of any criminal offense
11 whatsoever or if the Defendant tests positive for any controlled substance.

12 17. Appeal Rights:

13 In return for the concessions that the United States has made in this Plea
14 Agreement, the Defendant agrees to waive his right to appeal the conviction and
15 sentence if the Court imposes a prison term no higher than 60 months and
16 imposes no more than 5 years supervised release. Defendant further expressly
17 waives his right to file any post-conviction motion attacking his conviction and
18 sentence, including a motion pursuant to 28 U.S.C. § 2255, except one based
19 upon ineffective assistance of counsel based on information not now known by
20 Defendant and which, in the exercise of due diligence, could not be known by
21 Defendant by the time the Court imposes the sentence. Should the Defendant
22 successfully move to withdraw from this Plea Agreement or should the
23 Defendant's conviction on the Second Superseding Indictment be dismissed, set
24 aside, vacated, or reversed, the Plea Agreement shall become null and void; the
25 United States may move to reinstate all counts of the Second Superseding
26 Indictment No. 4:15-CR-6049-EFS; and the United States may prosecute the
27 Defendant on all available charges involving or arising out of the Second

1 Superseding Indictment No. 4:15-CR-6049-EFS. Nothing in this Plea Agreement
2 shall preclude the United States from opposing any post-conviction motion for a
3 reduction of sentence or other attack of the conviction or sentence, including, but
4 not limited to, proceedings pursuant to 28 U.S.C. § 2255 (writ of habeas corpus).


5 19. Integration Clause:

6 The United States and the Defendant acknowledge that this document
7 constitutes the entire Plea Agreement between the United States and the
8 Defendant, and no other promises, agreements, or conditions exist between the
9 United States and the Defendant concerning the resolution of the case. This Plea
10 Agreement is binding only upon the United States Attorney's Office for the
11 Eastern District of Washington, and cannot bind other federal, state or local
12 authorities. The United States and the Defendant agree that this agreement
13 cannot be modified except in a writing that is signed by the United States and the
14 Defendant.

15 Approvals and Signature

16 Agreed and submitted on behalf of the United States Attorney's Office for
17 the Eastern District of Washington.

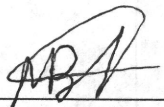
18 Joseph H. Harrington
19 United States Attorney

20 
21 _____
22 Stephanie Van Marter
23 Assistant U.S. Attorney

24 2/4/19
25 _____
26 Date

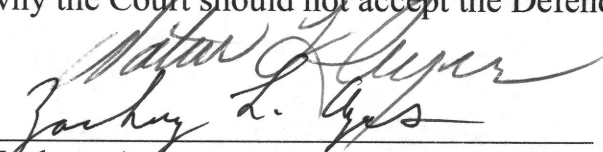
27 I have read this Plea Agreement and have carefully reviewed and discussed
28 every part of the agreement with my attorney. I understand and voluntarily enter
into this Plea Agreement. Furthermore, I have consulted with my attorney about
my rights, I understand those rights, and I am satisfied with the representation of
my attorney in this case. My attorney has advised me that by pleading guilty to

1 the charge relevant to this Plea Agreement, as of this date deportation appears to
 2 be a virtual certainty. No other promises or inducements have been made to me,
 3 other than those contained in this Plea Agreement and no one has threatened or
 4 forced me in any way to enter into this Plea Agreement. I am agreeing to plead
 5 guilty because I am guilty.

6 
 7 MARCIAL BRAVO-ZAMBRANO
 8 Defendant

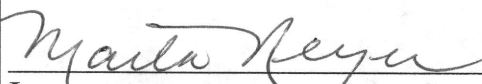
1-29-2019
 Date

10 I have read the Plea Agreement and have discussed the contents of the
 11 agreement with my client. The Plea Agreement accurately and completely sets
 12 forth the entirety of the agreement between the parties. I concur in my client's
 13 decision to plead guilty as set forth in the Plea Agreement. I have further advised
 14 my client by pleading guilty to the charge relevant to this Plea Agreement, as of
 15 this date deportation appears to be a virtual certainty. There is no legal reason
 16 why the Court should not accept the Defendant's plea of guilty.

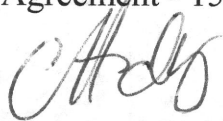
17 
 18 Zachery Ayers
 19 Attorney for the Defendant

1/29/18
 1-29-18
 Date

20 I hereby certify that I have read and translated the entire foregoing
 21 document to the Defendant in a language with which he is conversant. If
 22 questions have arisen, I have notified the Defendant's counsel of the questions
 23 and have not offered nor given legal advice nor personal opinions.
 24

25
 26 
 27 Interpreter WA State Court Certified
 28 Spanish Interpreter
 Plea Agreement - 15 # 9412

1-29-19
 Date

 CAROLINA HICKEY
 INTERPRETER